

FROM : Molins & Co.

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In Re Application of: Griffith et al.
US Application Number: 10/028,475

Filing Date: December 19, 2001

Title: **SYSTEM AND METHOD FOR COLLECTING AND REPRESENTING
KNOWLEDGE HEIRARCHIES**

Group Art Unit: 2125

Examiner: Carlos Ortiz-Rodriguez

September 25, 2003

FAX: 703 308 6606

ATTENTION: Carlos Ortiz-Rodriguez

Reply to Official Action

Dear Sirs,

Amendments to the Claims

Please amend the claims in accordance with the attached sheet and the USPTO "revised format" signed Jan., 31 2003.

Arguments and Explanation

The Applicant has carefully reviewed the Official Action of June 27, 2003. In that Action the examiner has rejected the claims as follows:

- §102: 1-10 on Goel
- §103: 2-6 and 11-18 on Goel and Scott
- §103: 7 and 8 on Goel and Scott and Goward
- §103: 9 and 19-20 on Goel and Scott and Nasr

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The Applicant respectfully disagrees with the examiner's conclusions. It is submitted that the examiner has misinterpreted the claims, the prior art and the legal standards which apply to the examination of the claims on the grounds of novelty and obviousness. In order to assist the examiner and to clarify the issues, the Applicant now provides an explanation and also claim amendments intended to highlight the differences between the claimed invention and the art of record.

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One of the key features which differentiate the Applicant's invention from any of the art cited by the examiner, or any permissible combination of that art, is that the invention enables the simplified collection or acquisition of knowledge by user input and not just the use of TMK and SBF as is the case with the cited art. No art of record illustrates, suggests or teaches the coupling of TMK and SBF in a way which allows for simplified collection of TMK knowledge from a user. The entirety of Goel's work is focused on already completed TMK and SBF structures.

In contrast the Scott reference is about obtaining knowledge from experts but not at all about obtaining SBF or TMK. Thus the examiner has attempted to combine references which have little to do with each other. The examiner is well aware that such a combination is no more than a hindsight reconstruction of the invention, once having had the benefit of the applicant's disclosure. Made legally, such a combination must be supported by a motive or suggestion or teaching originating in the prior art for the combination. The applicant submits that the John Deere and ACS Hospital System v. Montefiori standards have not been adhered to and that the combination must legally fail.

The examiner must also consider that in the Goel reference "selection of a method" refers to how the Kritik3 system chooses one method over another. User selection is not enabled or suggested in Goel. In the Applicant's invention, and in the context of the specification and claims (particularly the amended ones) that express that invention, "selection" refers to a new way of easily allowing the user to select that method.

Further nowhere in Goel or any of the cited art is there a teaching, motivation or suggestion that SBF behaviors can exist as TMK structures. This is significant and now expressed more clearly in the claims. This feature enables the commercially desirable objective of a uniform interface for behaviors and other processes which the software ultimately seeks to collect.

Favorable reconsideration and allowance are urged.

Regards,



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